

STATE OF NEW MEXICO
COUNTY OF RIO ARriba
FIRST JUDICIAL DISTRICT COURT

VERONICA VIGIL,

Plaintiff,

vs.

Case No. D-117-CV-2014-00380

ANNE TAINTOR, ANNE TAINTOR, INC.,
and DOODLETS, LLC,

Defendants.

AFFIDAVIT OF STEPHEN YOUNG

I, Stephen Young, being first duly sworn, depose and state as follows:

1. I am over the age of 18, of sound mind and not otherwise disqualified from making this affidavit.

2. I am a co-owner of Doodlet's, LLC, which is a co-defendant in the above-captioned case (although the named party is incorrectly identified as "Doodlets, LLC").

3. Upon information and belief, "Doodlet's" was founded in 1955.

4. On June 21, 2010, Doodlet's, LLC acquired certain assets from "Doodlet's Ltd." (an unrelated entity), which included the name "Doodlet's."

5. Doodlet's, LLC, only sells products in our store located at 120 Don Gaspar Avenue, Santa Fe, New Mexico, and does not sell any of its products online.

6. Prior to August 3, 2012, Doodlet's, LLC did to sell Anne Taintor, Inc.'s products in its store. Its first purchase order for Anne Taintor, Inc. products was in July, 2012, and consisted solely of coin purses and pens.

7. Since beginning to sell Anne Taintor, Inc. products in August, 2012, Doodlet's, LLC has only sold Anne Taintor, Inc. greeting cards, pens, luggage tags, memo pads, coin



purses, and socks.

8. After diligent search of its records, including all purchase orders issued to and invoices received from Ann Taintor, Inc., Doodlet's, LLC did not purchase, carry or sell any product that contained Plaintiff Veronica Vigil's image which is the subject of this lawsuit.

9. FURTHER AFFIANT SAYETH NAUGHT.


STEPHEN YOUNG
Vice-President of Doodlet's, LLC

STATE OF NEW MEXICO)
COUNTY OF Santa Fe)ss

SUBSCRIBED AND SWORN TO before me this 22nd day of December, 2014, by
Stephen Young.


Notary Public

My commission expires:

07/26/2017

